

Gregory L. Blueford (SBN 302628)
Email: gblueford@fisherphillips.com
Matthew R. Carpenter (SBN 351659)
FISHER & PHILLIPS LLP
621 Capitol Mall, Suite 1400
Sacramento, California 95814
Telephone: (916) 210-0400
Facsimile: (916) 210-0401

Atorneys for Defendant
FEDEX GROUND PACKAGE SYSTEM, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

LATEECE HENDERSON, an individual;

CASE NO.: 2:23-cv-1904-TLN-DB

Plaintiff,

*[Originally Sacramento County Superior Court
Case No. 23CV005397]*

FEDEX GROUND PACKAGE SYSTEM,
INC., a foreign corporation; and DOES 1
through 50,

**JOINT STIPULATION TO AMEND THE
INITIAL PRETRIAL SCHEDULING
ORDER RE: DISCOVERY DEADLINES;
ORDER**

Defendants.

Complaint Filed: July 21, 2023
Trial Date: None

1 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Lateece Henderson
2 (“Plaintiff”) and Defendant FedEx Ground Package System, Inc. (“Defendant” or “FedEx Ground”)
3 (collectively, the “Parties”), through their counsel of record, as follows:

4 **RECITALS**

5 WHEREAS, on September 19, 2023, the Court entered an Initial Pretrial Scheduling Order (Dkt.
6 5) which provided, in relevant part, “All discovery, with the exception of expert discovery, shall be
7 completed no later than two hundred forty (240) days from the date upon which the last answer may be
8 filed with the Court pursuant to the Federal Rules of Civil Procedure. In this context, “completed” means
9 that all discovery shall have been conducted so that all depositions have been taken and any disputes
10 relative to discovery shall have been resolved by appropriate order if necessary, and where discovery
11 has been ordered, the order has been obeyed. All motions to compel discovery must be noticed on the
12 magistrate judge’s calendar in accordance with the Local Rules.”;

13 WHEREAS, the last Answer was filed on September 5, 2023 by Defendant. Therefore, the
14 deadline to complete discovery is currently May 2, 2024;

15 WHEREAS, the Parties have been informally discussing settlement and have exchanged
16 settlement offers and counteroffers;

17 WHEREAS, the Parties have determined that it will not be possible to complete discovery by the
18 current May 2, 2024 discovery cutoff deadline and that an extension of the discovery deadline will be
19 beneficial to both Plaintiff and Defendant.

20 THEREFORE, good cause having been shown, the Parties stipulate and respectfully request that
21 the Court amend its scheduling order and set the fact discovery deadline, with the exception of expert
22 discovery, to December 27, 2024. The Parties will track the Court’s instructions and timeline in the
23 Initial Pretrial Scheduling Order for completing all discovery of expert witnesses and dispositive
24 motions.

25 IT IS SO STIPULATED.

26 ///

27 ///

28 ///

1 DATE: April 16, 2024

FISHER & PHILLIPS LLP

3 By: /s/ Gregory L. Blueford

Gregory L. Blueford

Matthew R. Carpenter

5 Attorneys for Defendant

FEDEX GROUND PACKAGE SYSTEM, INC.

7 DATE: April 16, 2024

JUSTICE FOR WORKERS, P.C.

9 By: /s/ Michelle Avidisyans (as authorized on 4.16.24)

Young K. Park

Michelle Avidisyans

11 Attorneys for Plaintiff

LATEECE HENDERSON

ORDER

Having reviewed the Parties Joint Stipulation to Amend the Initial Pretrial Scheduling Order re: Discovery Deadlines (“Stipulation”) and GOOD CAUSE APPEARING, the Court hereby orders as follows:

1. The Parties' Stipulation is **GRANTED**;
 2. Discovery deadlines are as follows:
 - (a) Fact Discovery Cut-off: December 27, 2024;
 - (b) Expert Disclosure: February 25, 2025;
 - (c) Supplemental/Rebuttal Expert Disclosure: March 27, 2025;
 - (d) Supplemental Disclosures and Responses: May 27, 2025.
 3. Expert Discovery Cut-off: The Parties will follow the Court's instruction in the Initial Scheduling Order to complete all discovery of expert witnesses in a timely manner to comply with the Court's deadline for filing dispositive motions.
 4. Last Day to File Dispositive Motions: June 25, 2025.

IT IS SO ORDERED.

Dated: April 17, 2024


Troy L. Nunley
United States District Judge